

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

FTX TRADING LTD., *et al.*,¹

Case No. 22-11068 (JTD)

Debtors.

(Jointly Administered)

Objection Deadline: April 6, 2023 at 4:00 p.m. (ET)²

Hearing Date: June 28, 2023 at 1:00 p.m. (ET)

**SUPPLEMENT TO FIRST INTERIM FEE REQUEST OF
YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Young Conway Stargatt & Taylor, LLP (“**Young Conway**”), co-counsel to the Official Committee of Unsecured Creditors appointed in the above-captioned chapter 11 cases (the “**Committee**”), hereby supplements the *First Interim Fee Request of Young Conway Stargatt & Taylor, LLP* (the “**Interim Fee Request**”) for the period from December 22, 2022 through and including January 31, 2023 (the “**Request Period**”) by attaching, as Exhibits A through E hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the “**UST Guidelines**”). In addition, Young Conway respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

a. During the Request Period, Young Conaway did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees, or terms.

¹ The last four digits of FTX Trading Ltd.'s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The objection deadline set forth herein is for all parties other than the Fee Examiner and the U.S. Trustee (each as defined in the Fee Examiner Order), whose objection deadline shall be governed by that certain *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [Docket No. 834] (the “Fee Examiner Order”).

b. The fees and expenses sought by Young Conaway in the Interim Fee Request are less than the fees and expenses budgeted in Young Conaway's budget and staffing plan for the Request Period.

c. The professionals included in the Interim Fee Request did not vary their hourly rate based on the geographic location of the bankruptcy cases.

d. The Interim Fee Request did not include any fees dedicated to revising time records or preparing and revising invoices that would not normally be compensable outside of bankruptcy.

e. The time period covered by the Interim Fee Request includes .9 hours (with a value of \$922.50) spent by Young Conaway to ensure that the time entries included in certain of the monthly fee applications that are subject to the Interim Fee Request comply with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and do not disclose privileged or confidential information. This review, and any revisions associated therewith, are a necessary component of Young Conaway's preparation of each monthly fee application.

f. As disclosed in Young Conaway's retention application and the monthly fee applications that are subject to the Interim Fee Request, the Interim Fee Request includes a rate increase that went into effect on January 1, 2023, after the effective date (December 22, 2022) of Young Conaway's retention in these chapter 11 cases, but prior to the date (February 8, 2023) of the Court's order approving Young Conaway's retention application [Docket No. 657] (the "Retention Order"). In accordance with the Retention Order, Young Conaway will provide five business days' notice to the Committee, the Debtors and the U.S. Trustee in connection with any increase of its hourly rates occurring after the date of the Retention Order.

Dated: March 17, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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EXHIBIT A**CUSTOMARY AND COMPARABLE
COMPENSATION DISCLOSURES**

Young Conaway's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by similarly skilled bankruptcy attorneys. In addition, Young Conaway's hourly rates for bankruptcy services are comparable to the rates charged by the Firm for other complex corporate and litigation matters. The rates charged by the Firm for the services performed in the prior calendar year in the practice areas that are comparable to the services performed by the Bankruptcy and Corporate Restructuring section – namely, Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation – are set forth below. Also included below is 2022 blended hourly rate information for all sections of the Firm, excluding the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

Category of Timekeeper	2022 Blended Hourly Rate		
	Billed In comparable practice areas for preceding calendar year ¹	Billed Firm-wide for preceding calendar year ²	Billed This Interim Request
Partner	\$817	\$743	\$910
Counsel	\$668	\$603	N/A
Associate	\$457	\$449	\$545
Paralegal	\$293	\$206	\$355
Aggregated:	\$605	\$552	\$810

¹ This column reflects the blended 2022 rates charged by the firm for complex corporate and litigation matters in the following sections of the firm: Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation.

² This column excludes blended hourly rates for the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

EXHIBIT B**SUMMARY OF TIMEKEEPERS INCLUDED IN THE FIRST INTERIM FEE REQUEST**

Name	Title	Department	Date of First Admission	Fees Billed in the Request Period (\$)	Hours Billed in the Request Period	Hourly Rate Billed in the Request Period (\$)
Matthew B. Lunn	Partner	Bankruptcy	2001	\$98,205.50	98.30	\$915.00/\$1025.00
Robert F. Poppiti	Partner	Bankruptcy	2007	\$180,143.50	207.50	\$795.00/\$890.00
Jared Kochenash	Associate	Bankruptcy	2018	\$27,886.00	51.20	\$500.00/\$560.00
Debbie Laskin	Paralegal	Bankruptcy	N/A	\$12,865.00	36.20	\$335.00/\$365.00
Jose Martinez	Paralegal	Bankruptcy	N/A	\$426.00	1.20	\$355.00
Totals				\$319,526.00	394.40	

EXHIBIT C

BUDGET AND STAFFING PLAN

BUDGET AND STAFFING PLAN

Professional	2022 Hourly Rate	2023 Hourly Rate	Budgeted Hours for Dec. 2022	Budgeted Hours for Jan. 2023
Matthew B. Lunn <i>Partner since 2010. Joined firm as an associate in 2001. Member of the DE Bar since 2001 and NY Bar since 2009.</i>	\$915	\$1,025	50	100
Robert F. Poppiti <i>Partner since 2018. Joined firm as an associate in 2007. Member of the DE Bar since 2007 and NY Bar since 2015.</i>	\$795	\$890	50	175
Michael S. Neiburg <i>Partner since 2019. Joined firm as associate in 2008. Member of DE Bar since 2009.</i>	\$800	\$900	25	25
Jared Kochenash <i>Joined firm as an associate in 2018. Member of the DE Bar since 2018.</i>	\$500	\$560	25	50
Roxanne M. Eastes <i>Joined firm as associate in 2020. Member of DE Bar since 2019 and NY Bar since 2020.</i>	\$500	\$560	25	25
Debbie Laskin <i>Paralegal</i>	\$335	\$365	25	25
TOTAL			200	400

Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budgeted Fee Period	Average 2022 Hourly Rate¹	Average 2023 Hourly Rate¹
Partners	3	\$845.83	\$935.83
Associates (7 or more years since first admission)	-	-	-
Associate (4-6 years since first admission)	1	\$500	\$560
Associate (less than 4 years since first admission)	1	\$500	\$560
Paralegal	1	\$335	\$365

¹ The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the Budgeted Period.

<u>December 2022</u>	<u>January 2023</u>	<u>Total</u>
Fees: \$100,000 Expenses: \$2,500 Total: \$102,500	Fees: \$315,000 Expenses: \$7,875 Total: \$322,875	Fees: \$415,000 Expenses: \$10,375 Total: \$425,375

<u>Project Category</u>		<u>Budgeted Hours</u>	<u>Budgeted Fees</u>	<u>Actual Hours</u>	<u>Actual Fees</u>
B001	Case Administration	100	\$70,000	91.8	\$68,505.50
B002	Court Hearings	100	\$70,000	52.70	\$44,759
B004	Schedules & Statements, U.S. Trustee Reports	10	\$7,500	2.20	\$1,985
B005	Lease/Executory Contract Issues	25	\$20,000	7.7	\$6,681.50
B006	Use, Sale or Lease of Property (363 issues)	70	\$55,000	30.3	\$25,245
B007	Claims Analysis, Objections and Resolutions	5	\$5,000	1.3	\$1,067
B008	Meetings	50	\$45,000	49.10	\$45,911
B009	Stay Relief Matters	10	\$5,000	8.4	\$5,183.50
B011	Other Adversary Proceedings	50	\$20,000	19.8	\$18,554.50
B012	Plan and Disclosure Statement	0	\$0	0.0	\$0
B013	Creditor Inquiries	5	\$4,000	0.0	\$0
B014	General Corporate Matters	5	\$5,000	2.7	\$2,635.50
B015	Employee Matters	0	\$0	1.3	\$1,069.50
B016	Asset Analysis	5	\$5,000	2.9	\$2,548
B017	Retention of Professionals/Fee Issues	125	\$75,000	106.6	\$80,731.50
B018	Fee App Prep	5	\$3,500	0.9	\$922.50
B020	Utility Services	0	\$0	0.0	\$0
BN014	FTX Digital Chapter 15 Proceeding	35	\$25,000	16.7	\$13,727
BN015	Voyager Litigation and Claims	0	\$0	0.0	\$0
Total		600	\$400,000	394.40	\$319,526

EXHIBIT D**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENT**

SUMMARY OF COMPENSATION BY PROJECT CATEGORY		
Project Category	Hours Billed	Fees Sought (\$)
Case Administration (B001)	91.80	\$68,505.50
Court Hearings (B002)	52.70	\$44,759.00
Schedules & Statements, U.S. Trustee Reports (B004)	2.20	\$1,985.00
Lease/Executory Contract Issues (B005)	7.70	\$6,681.50
Use, Sale or Lease of Property (B006)	30.30	\$25,245.00
Claims Analysis, Objections & Resolutions (B007)	1.30	\$1,067.00
Meetings (B008)	49.10	\$45,911.00
Stay Relief Matters (B009)	8.40	\$5,183.50
Other Adversary Matters (B011)	19.80	\$18,554.50
General Corporate Matters (B014)	2.70	\$2,635.50
Employee Matters (B015)	1.30	\$1,069.50
Asset Analysis (B016)	2.90	\$2,548.00
Retention of Professionals/Fee Issues (B017)	106.60	\$80,731.50
Fee Application Preparation (B018)	0.90	\$922.50
FTX Chapter 15 Proceeding (BN014)	16.70	\$13,727.00
Totals	394.40	\$319,526.00

SUMMARY OF EXPENSE REIMBURSEMENT	
Category	Amount (\$)
Reproduction	\$484.60
Federal Express	\$119.57
Transcripts	\$294.00
Filing Fees	\$50.00
Delivery	\$64.00
Working Meals	\$499.13
Docket Retrieval/Search	\$17.20
Total	\$1,528.50

EXHIBIT E

SUMMARY OF FIRST INTERIM FEE REQUEST	
Name of Applicant	Young Conaway Stargatt & Taylor, LLP
Name of Client	the Official Committee of Unsecured Creditors
Time period covered by the Interim Fee Request	December 22, 2022 through January 31, 2023
Total compensation sought during the Request Period	\$319,526.00
Total expenses sought during the Request Period	\$1,528.50
Petition Date	November 11, 2022
Retention Date	December 22, 2022
Date of order approving employment	February 8, 2023
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Total allowed compensation paid to date	\$0.00
Total allowed expenses paid to date	\$0.00
Blended rate in the Interim Fee Request for all attorneys	\$858.00
Blended rate in the Interim Fee Request for all timekeepers	\$810.00
Compensation sought in the Interim Fee Request already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$255,620.80
Expenses sought in the Interim Fee Request already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$1,528.50
Number of professionals included in the Interim Fee Request	5
If applicable, number of professionals in the Interim Fee Request not included in staffing plan for Request Period	N/A
If applicable, difference between fees and expenses budgeted and sought during the Request Period	\$425,375.00 – Budgeted Amount \$319,526.00 – Amount Sought
Number of professionals billing fewer than 15 hours to the case during the Request Period	1
Are any rates higher than those approved or disclosed at retention?	No